

Anthony W. Rector
General Delivery
Los Alamitos, California, 90720
Telephone: 424-702-7996

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

ANTHONY W. RECTOR

Plaintiff,

V.

RECEIVEABLES PERFORMANCE
MANAGEMENT (RPM); WESTERN
DENTAL SERVICES INC.; AND DOES 1
through 10 Inclusive

Defendant(s),

SACV 13-01897 UA(DUTYx)

CASE NO:

COMPLAINT FOR VIOLATION OF
TELEMARKETING AND THE
TELEPHONE CONSUMER
PROTECTION ACT (TCPA)

TRIAL BY JURY DEMANDED

JURISDICTION

1. This is an action for damages brought by an individual consumer, against Defendant(s), RECEIVEABLES PERFORMANCE MANAGEMENT (RPM), WESTERN DENTAL SERVICES INC for violations of the Telephone Consumer Protection Act ("TCPA"), 47 U.S.C. §§ 227, et seq., the Fair Debt Collections Act, 15 U.S.C. §§ 1692, et seq. ("FDCPA"), and the invasions of Plaintiff's personal privacy by the Defendant and its agents in their illegal efforts to collect a consumer debt.

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CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
SANTA ANA

BY

1 2. Jurisdiction of this Court arises under 28 U.S.C. § 1331.

2 3. Venue is proper in this District pursuant to 28 U.S.C. §1391.

3
4 **PARTIES**

5 4. Plaintiff, ANTHONY W. RECTOR, is an adult individual residing in Los Alamitos,
6 California.

7 5. Plaintiff is a consumer within the meaning of the TCPA and the FDCPA.

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9 6. Defendant, RECEIVEABLES PERFORMANCE MANAGEMENT (RPM), is a California
10 corporation with a principal place of business at 20816 44th Ave W., Lynnwood, WA 98036
11 operating as a collection agency, and is a “debt collector” as the term is defined by 15 U.S.C. §§
12 1692a(6) and the California Fair Debt and Collections Practices Act (CFDCPA), California
13 Civil Code section 1788(1)(2).
14

15 **FACTUAL ALLEGATIONS**

16 7. At all pertinent times hereto, Defendant was collecting a debt relating to Western Dental
17 Corporation.

18 8. The debt at issue arises out of an alleged transaction which was primarily for personal, family,
19 or household purposes.
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21 9. At all times material and relevant hereto, Plaintiff did not owe the debt to Defendant, and has
22 never owed a debt to Defendant.

23 10. January 12, 2013; Defendant called Plaintiff’s cellular telephone number 424-288-xxxx (at
24 2:12 P.M.) using artificial and/or prerecorded voice technology to coerce payment of the debt,
25 with the intent to annoy, abuse or harass Plaintiff. Defendant then continued to repeatedly call
26 Plaintiff’s cellular telephone number on the following dates: January 13th (at 7:10 A.M.),
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28

January 13th (at 1:28 P.M.), January 15th (at 4:33 P.M.), January 15th (at 7:32 P.M.), January 15th (at 5:32 P.M.), January 18th (at 9:24 A.M.), and January 18th (at 7:43 P.M.), January 19th (at 3:10 P.M.), January 20th (at 9:32 P.M.), January 20th (at 5:20 P.M.), January 20th (at 6:12 P.M.), and January 22nd (at 8:10 P.M.), January 22nd (at 8:23 P.M.), January 22nd (at 8:54 P.M.), February 4th (at 9:33 P.M.), February 4th (at 9:41 P.M.), February 4th (at 10:02 P.M.), and February 6th (at 10:24 P.M.), February 6th (at 9:33 A.M.), and February 7th (at 11:24 P.M.), February 7th (at 3:18 P.M.), February 8th (at 8:51 A.M.), and February 8th (at 1:46 P.M.), February 9th (at 1:50 P.M.), February 9th at (3:43 P.M.), P.M.), February 9th 2013 (at 9:10 A.M.), February 11th 2013 (at 11:13 A.M.), February 11th 2013 (at 2:10 P.M.), February 15th 2013 (at 3:30 P.M.), February 15th 2013 (at 7:22 P.M.), February 15th 2013 (at 10:45 P.M.), February 15th 2013 (at 7:30 A.M.), February 16th 2013 (at 9:50 A.M.), February 17th 2013 (at 2:14 P.M.), February 17th 2013 (at 7:36 P.M.), February 17th 2013 (at 12:52 P.M.), February 21st 2013 (at 1:30 P.M.), February 21st 2013 (at 2:14 P.M.), February 23rd 2013 (at 3:20 P.M.), February 25th 2013 (at 5:33 P.M.), February 25th, 2013 (at 7:05 P.M.), February 25th 2013 (at 7:49 P.M.), March 7th 2013 (at 9:20 A.M.), March 8th 2013 (at 10:40 A.M.), March 9th 2013 (at 11:24 P.M.), March 9th 2013 (at 12:15 A.M.), March 11th 2013 (at 1:15 A.M.), March 12th 2013 (at 10:45 A.M.), March 13th 2013 (at 8:57 A.M.), March 14th 2013 (at 3:19 P.M.), March 17th 2013 (at 9:42 A.M.) for total of 51 calls.

11. Defendant acted in a false, deceptive, misleading and unfair manner by repeatedly communicating with Plaintiff at inconvenient times.

12. Defendant acted in a false, deceptive, misleading and unfair manner by causing a telephone to ring with intent to annoy, abuse, or harass any person at the called number.

13. Defendant knew or should have known that their actions violated the TCPA and the FDCPA.

COUNT I-VIOLATIONS OF THE TCPA

14. Plaintiff incorporates the foregoing paragraphs as though the same were set forth at length herein.

15. At all times relevant hereto, Defendant used, controlled and or operated "automatic telephone dialing systems" as defined by § 227(a)(1) of the TCPA and the California Fair Debt and Collections Practices Act (CFDCPA), California Civil Code section 1788(1)(2).

16. Defendant initiated at least seven (47) telephone calls to Plaintiff's telephone line using artificial and or prerecorded voices to deliver messages without the express consent of Plaintiff, in violation of 47 U.S.C. § § 227 (1)(A)(iii) of the TCPA and the California Fair Debt and Collections Practices Act (CFDCPA), California Civil Code section 1788(1)(2).

17. The acts and or omissions of Defendant were done unfairly, unlawfully, intentionally, deceptively and fraudulently and absent bona fide error, lawful right, legal defense justification or legal excuse.

18. As a result of the above violations of the TCPA, Defendant is liable to Plaintiff in the sum of Plaintiff's statutory damages, actual damages, and treble damages.

COUNT II-VIOLATIONS OF THE FDCPA

19. Plaintiff incorporates the foregoing paragraphs as though the same were set forth at length herein.

20. The Defendant caused a phone to ring repeatedly with the intent to annoy and harass, in violation of 15 U.S.C. § 1692d(5).

21. The Defendant employed false and deceptive means to collect a debt, in violation of 15

1 U.S.C. § 1692e(10).

2 22. The Plaintiff is entitled to damages as a result of Defendant's violations.

3
4 **COUNT III**
5 **VIOLATION OF CALIFORNIA FAIR DEBT AND COLLECTIONS**
6 **PRACTICES ACT (CFDCPA), CAL. STAT. §1788 BY DEFENDANTS**
7 **RECEIVABLES PERFORMANCE MANAGEMENT (RPM);**
8 **WESTERN DENTAL SERVICES INC**

9 23. Plaintiff alleges and incorporates the information in paragraphs 1 through 22.

10 24. Plaintiff is a consumer within the meaning of §1788(1)(2).

11 25. RPM is a debt collector within the meaning of §1788(1)(2).

12 26. Defendants violated §1788(1)(2) by claiming, attempting or threatening to enforce a debt
13 when such persons knew that the debt was not legitimate.
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16 **COUNT III-INVASION OF PRIVACY –INTRUSION UPON SECLUSION**

17 27. Plaintiff incorporates the foregoing paragraphs as though the same were set forth at
18 length herein.

19 28. Defendant invaded the privacy of Plaintiff by unreasonably intruding upon his seclusion by
20 calling his personal telephone and leaving messages in relation to a debt that Plaintiff did not
21 owe to Defendant.
22

23 29. Defendant intruded, physically or otherwise, upon to solitude and or seclusion of Plaintiff in
24 a manner which was highly offensive to Plaintiff and other reasonable persons if same should be
25 in similar positions.
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27 30. Defendant's intentional intrusions, physical or otherwise, upon the solitude and or seclusion
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1 of Plaintiff were substantial and highly offensive.

2 31. As a direct and proximate cause of the telephone calls that harassed, annoyed and abused
3 Plaintiff, Defendant disturbed the peace and tranquility of his home, invaded Plaintiff's privacy
4 and intruded upon his seclusion, was a substantial factor in bringing about the serious injuries,
5 damages and harm to Plaintiff that are outlined more fully above and, as a result, Defendant is
6 liable to compensate Plaintiff for the full amount of actual, compensatory and punitive damages,
7 as well as such other relief, permitted under the law.
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10 **JURY TRIAL DEMAND**

11 32. Plaintiff demands trial by jury on all issues so triable.

12 **PRAYER FOR RELIEF**

13 WHEREFORE, Plaintiff respectfully prays that relief be granted as follows:

14 (a) Actual damages; pursuant to 15 U.S.C. § 1692k; and the California Fair Debt and
15 Collections Practices Act (CFDCPA), California Civil Code section 1788(1)(2).
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17 (b) Statutory damages; pursuant to 15 U.S.C. § 1692k; and the California Fair Debt and
18 Collections Practices Act (CFDCPA), California Civil Code section 1788(1)(2).
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- 1 (c) Punitive damages;
2 (d) Treble damages;
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4 (e) Such other and further relief s may be just and proper.
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6 DATED: 12/4/13
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8 Respectfully submitted,
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10 By: 
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12 Anthony W. Rector
13 In Pro Per
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UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET

I (a) PLAINTIFFS (Check box if you are representing yourself <input checked="" type="checkbox"/> ANTHONY W. RECTOR	DEFENDANTS RECEIVABLES PERFORMANCE MANAGEMENT (RPM); WESTERN DENTAL SERVICES INC.; AND DOES 1 through 10 Inclusive
(b) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.) Anthony W. Rector General Delivery Los Alamitos, California, 90720, 424-702-7996	Attorneys (If Known) NOTB KNOWN

II. BASIS OF JURISDICTION (Place an X in one box only.) <input type="checkbox"/> 1 U.S. Government Plaintiff <input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party) <input type="checkbox"/> 2 U.S. Government Defendant <input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)	III. CITIZENSHIP OF PRINCIPAL PARTIES - For Diversity Cases Only (Place an X in one box for plaintiff and one for defendant.) <table style="width:100%; border: none;"> <tr> <td style="width:33%; border: none;">Citizen of This State</td> <td style="width:10%; border: none; text-align: center;">PTF</td> <td style="width:10%; border: none; text-align: center;">DEF</td> <td style="width:33%; border: none;">Incorporated or Principal Place of Business in this State</td> <td style="width:10%; border: none; text-align: center;">PTF</td> <td style="width:10%; border: none; text-align: center;">DEF</td> </tr> <tr> <td style="border: none;"></td> <td style="border: none; text-align: center;"><input checked="" type="checkbox"/> 1</td> <td style="border: none; text-align: center;"><input type="checkbox"/> 1</td> <td style="border: none;"></td> <td style="border: none; text-align: center;"><input type="checkbox"/> 4</td> <td style="border: none; text-align: center;"><input checked="" type="checkbox"/> 4</td> </tr> <tr> <td style="border: none;">Citizen of Another State</td> <td style="border: none; text-align: center;"><input type="checkbox"/> 2</td> <td style="border: none; text-align: center;"><input type="checkbox"/> 2</td> <td style="border: none;">Incorporated and Principal Place of Business in Another State</td> <td style="border: none; text-align: center;"><input type="checkbox"/> 5</td> <td style="border: none; text-align: center;"><input type="checkbox"/> 5</td> </tr> <tr> <td style="border: none;">Citizen or Subject of a Foreign Country</td> <td style="border: none; text-align: center;"><input type="checkbox"/> 3</td> <td style="border: none; text-align: center;"><input type="checkbox"/> 3</td> <td style="border: none;">Foreign Nation</td> <td style="border: none; text-align: center;"><input type="checkbox"/> 6</td> <td style="border: none; text-align: center;"><input type="checkbox"/> 6</td> </tr> </table>	Citizen of This State	PTF	DEF	Incorporated or Principal Place of Business in this State	PTF	DEF		<input checked="" type="checkbox"/> 1	<input type="checkbox"/> 1		<input type="checkbox"/> 4	<input checked="" type="checkbox"/> 4	Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6
Citizen of This State	PTF	DEF	Incorporated or Principal Place of Business in this State	PTF	DEF																				
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Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6																				

IV. ORIGIN (Place an X in one box only.)

☒ 1 Original Proceeding
 ☐ 2 Removed from State Court
 ☐ 3 Remanded from Appellate Court
 ☐ 4 Reinstated or Reopened
 ☐ 5 Transferred from another district (specify):
 ☐ 6 Multi-District Litigation
 ☐ 7 Appeal to District Judge from Magistrate Judge

V. REQUESTED IN COMPLAINT: JURY DEMAND: ☒ Yes ☐ No (Check 'Yes' only if demanded in complaint.)

CLASS ACTION under F.R.C.P. 23: ☐ Yes ☒ No
 MONEY DEMANDED IN COMPLAINT: \$ 76,000

VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)

TCPA & FDCPA VIOLATIONS

VII. NATURE OF SUIT (Place an X in one box only.)

OTHER STATUTES <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input checked="" type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Act <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Info. Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes	CONTRACT <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	TORTS PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Fed. Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury-Med Malpractice <input type="checkbox"/> 365 Personal Injury-Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus-Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	TORTS PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability BANKRUPTCY <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 American with Disabilities - Employment <input type="checkbox"/> 446 American with Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus/Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition FORFEITURE / PENALTY <input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs <input type="checkbox"/> 660 Occupational Safety /Health <input type="checkbox"/> 690 Other	LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) (405(g)) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609
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FOR OFFICE USE ONLY:

Case Number:

SACV13-01897 UA(DUTY&)

AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET

VIII(a). IDENTICAL CASES: Has this action been previously filed in this court and dismissed, remanded or closed? ☒ No ☐ Yes

If yes, list case number(s): _____

VIII(b). RELATED CASES: Have any cases been previously filed in this court that are related to the present case? ☒ No ☐ Yes

If yes, list case number(s): _____

Civil cases are deemed related if a previously filed case and the present case:

- (Check all boxes that apply) ☐ A. Arise from the same or closely related transactions, happenings, or events; or
☐ B. Call for determination of the same or substantially related or similar questions of law and fact; or
☐ C. For other reasons would entail substantial duplication of labor if heard by different judges; or
☐ D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

IX. VENUE: (When completing the following information, use an additional sheet if necessary.)

(a) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** named plaintiff resides.

☐ Check here if the government, its agencies or employees is a named plaintiff. If this box is checked, go to item (b).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
ORANGE	

(b) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** named defendant resides.

☐ Check here if the government, its agencies or employees is a named defendant. If this box is checked, go to item (c).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
ORANGE	

(c) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** claim arose.

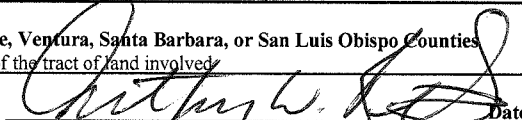
Note: In land condemnation cases, use the location of the tract of land involved.

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
ORANGE	

* Los Angeles, Orange, San Bernardino, Riverside, Ventura, Santa Barbara, or San Luis Obispo Counties

Note: In land condemnation cases, use the location of the tract of land involved.

X. SIGNATURE OF ATTORNEY (OR PRO PER):

 Date 12/4/13

Notice to Counsel/Parties: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet.)

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405(g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405(g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. (g))